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November 11, 1993

VIA FEDERAL EXPRESS

William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

NOV 12 1993

FCC - MAIL ROOM

Re: Amendment of FM Table of Allotments  
(Unionville and Douglas, Georgia)

Dear Mr. Caton:

Enclosed please find an original and four (4) copies of a Petition for Rulemaking, filed herewith on behalf of Orchon Media, Inc., which petition requests the reallocation of FM Channel 223A from the community of Douglas, Georgia to the community of Unionville, Georgia as FM Channel 223C3.

Also enclosed is an additional copy of the petition which we would appreciate your returning to the undersigned in the enclosed postage-paid, self-addressed envelope after it has been date-stamped by your office.

Should you or any members of your staff have questions concerning the enclosed, please contact the undersigned for clarification. Thank you for your cooperation in this matter.

Very truly yours,

MCCAMPBELL & YOUNG, P.C.

By:

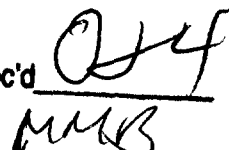
  
Robert S. Stone

RSS/cs

Enclosures

cc: Orchon Media, Inc.

No. of Copies rec'd  
List A B C D E



Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

RECEIVED  
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In the Matter of	)	MM Docket No. _____
	)	
Amendment of Section 73.202(b)	)	RM - _____
Table of Allotments,	)	
FM Broadcast Station	)	
(Unionville and Douglas, Georgia)	)	
	)	

To: Chief, Allocations Branch

**PETITION FOR RULEMAKING**

Orchon Media, Inc. ("Orchon" or "Petitioner"), permittee of FM broadcast station WKZZ, Douglas, Georgia, by counsel, and pursuant to § 1.420(g) and § 1.420(i) of the Commission's rules and regulations, hereby respectfully submits its Petition for Rulemaking, which seeks an amendment to the Commission's Table of FM Allotments, found in § 73.202(b) of the Commission's rules, so as to reclassify and reallocate FM Channel 223A as follows:

**Douglas, Georgia**

**Present**

223A, 258C, 294C1

**Proposed**

258C, 294C1

**Unionville, Georgia**

**Present**

----

**Proposed**

223C3

In support whereof, the following is shown:

1. As noted above, this petition is being filed in accordance with the Commission's rules which allow for the modification of a permit for an FM station in the course of a

rulemaking proceeding to another class of channel specifying a new community of license where the modification of permit and amended allotment would occur on a mutually exclusive higher class co-channel. As set forth in greater detail within the engineering statement attached hereto and incorporated herein by reference, Channel 223A can be reallocated from Douglas to Unionville as 223C3 in full compliance with the Commission's minimum spacing and city-grade coverage requirements. The proposed allotment and modification would also be mutually exclusive with Orchon's existing assignment for FM Channel 223A at Douglas, Georgia.

2. Approval of this proposal will provide the community of Unionville with its first local transmission service of any kind. The community of Douglas, meanwhile, would continue to receive service from two local AM and two local high-powered full-time FM transmission services. The proposed modification and allotment would therefore would be fully consistent with the Commission's allotment criteria as set forth in *Modification of FM and TV Authorizations (New Community of License)*, 4 FCC Rcd 4870, 66 RR 2d 877 (1991).

3. The community of Unionville, Georgia, listed in the census reports by the U. S. Bureau of the Census with a population of 2,710, is the second largest community in Tift County, Georgia. As noted above, Unionville presently is without local transmission service of any kind and is therefore recognized as deserving of a local FM station as proposed by Orchon herein. *FM Assignment Policies and Procedures*, 90 FCC 2d 88, 51 RR 2d 807 (1982).

4. Thus, the above proposal would fully comply with and further the Commission's FM allotment criteria and would further the public interest, convenience, and necessity by allowing for new and improved service to the public without depriving the community of Douglas, Georgia of its only local service. Petitioner hereby submits its commitment to prompt application for and construction of a facility consistent with its proposal herein immediately upon

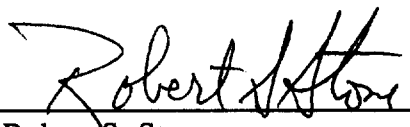
the effective date of the Commission's report and order reallocating FM Channel 223A from Douglas to Unionville as FM Channel 223C3.

WHEREFORE, premises considered, Orchon Media, Inc. respectfully urges the Commission to amend its Table of FM Allotments so as to reallocate FM Channel 223A, Douglas, Georgia to the community of Unionville, Georgia as FM Channel 223C3.

Respectfully Submitted,

ORCHON MEDIA, INC.

MCCAMPBELL & YOUNG, P.C.  
Its Attorneys

By:   
Robert S. Stone

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November 11, 1993

# ENGINEERING STATEMENT

UNIONVILLE, GEORGIA  
FM CHANNEL 223C3  
for  
ORCHON MEDIA, INC  
Permittee of WKZZ on Channel 223A, Douglas, GA

The attached engineering study of channel 223C3 for Unionville, Georgia was performed using the Commission's separation criteria contained in 47 C.F.R. Section 73.207, Minimum Distance Separation Between Stations. This study indicates that channel 223C3 can be assigned to Unionville, Georgia 1/ with the reference point 2/ 17.5 kilometers north-east (59 degrees) of the community (providing channel 223A, Douglas, GA is deleted). The proposed allocation point will avoid short-spacing WAAC-FM, channel 225C1, serving Valdosta, Georgia (BLH-860903KD); the construction permit and license of WDDQ, channel 221A, serving Adel, Georgia (BPH-910913IC & BLH-791009AG); and the addition of channel 222A for Pelham, Georgia.

## DISCUSSION

The FM Channel Spacing Study and Clearance Map, attached as Exhibits I and II, demonstrate that there is

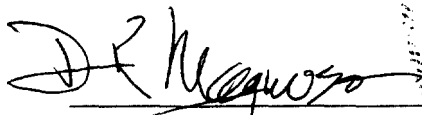
- 
- 1/ Coordinates for Unionville, GA city-center:  
N LAT 31-26-12; W LNG 83-30-12
  - 2/ Proposed reference coordinates for channel 223C3:  
N LAT 31-31-05; W LNG 83-20-43

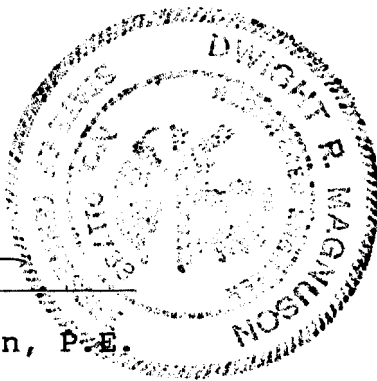
land northeast of Unionville, Georgia which will accommodate the site restriction and allow for a tower site.

At maximum facilities (25 kw ERP; 100m HAAT) a class C3 city-grade contour will cover approximately 24 kilometers from the antenna site. Therefore it is quite possible to provide Unionville, Georgia with the required city-grade signal from a transmitter site within the clearance area shown on Exhibit II.

#### CONCLUSION

Having demonstrated that this proposal meets the separation requirements of 47 C.F.R. Section 73.207 and that it also meets the city-grade coverage requirements of Section 73.315, the public interest will be served by deleting channel 223A serving Douglas, Georgia and the allotment of channel 223C3 to Unionville, Georgia.

  
Dwight R. Magnuson, P.E.



Dated: November 10, 1993

## EXHIBIT I

\*\*\*\*\*

## FM CHANNEL SPACING STUDY

\*\*\*\*\*

Job title: Unionville, GA: Allocation point

Channel: 223C3

Database file name: g:\fccdata\fm931028.edx

Latitude: 31 31 5

Longitude: 83 20 43

Pre-1989 Class A spacings?: N

CH	Call	Record	City	ST	Status	Bear.	Dist.	Reqd. Dist.	Result
223A	WOKF	5368	Folkston	GA	LIC	122.9	160.1	142.0	18.1
224A	WMOGFM	5421	St. Simons Island	GA	CP	102.1	182.4	89.0	
222C2	WSKX	5432	Hinesville	GA	LIC	83.5	186.5	117.0	
222C2		5437	Hinesville	GA	USED	76.4	173.8	117.0	
224A	WMOGFM	5438	St. Simons Island	GA	LIC	102.1	182.4	89.0	
223A		6064	Alachua	FL	VACANT	156.8	208.2	142.0	
223A	NEW	6065	Alachua	FL	APPGID	157.2	212.3	142.0	
223A	NEW	6066	Alachua	FL	APPDID	156.2	209.3	142.0	
223A	NEW	6067	Alachua	FL	APPDID	155.4	216.7	142.0	
223A		6077	Folkston	GA	USED	119.2	145.1	142.0	3.1
223A	WKZZ	6101	Douglas	GA	CP	85.8	43.2	142.0	-98.8
223A		6110	Douglas	GA	USED	81.8	41.3	142.0	-100.7
224A	WKKZ	6130	Dublin	GA	LIC	20.5	119.1	89.0	30.1
224C2	WKKZ	6133	Dublin	GA	CP	20.5	119.1	117.0	2.1
224C2		6156	Dublin	GA	USED	20.5	119.1	117.0	2.1
225C1	WAAC	6588	Valdosta	GA	LIC	180.7	79.2	76.0	3.2
225C1		6591	Valdosta	GA	USED	180.7	79.2	76.0	3.2
220A	NEW	6618	Monticello	FL	APP	211.2	109.8	42.0	
221A		6630	Adel	GA	USED	186.3	42.5	42.0	.5
221A	WDDQ	6647	Adel	GA	CP	180.5	42.0	42.0	-.0
221A	WDDQ	6656	Adel	GA	LIC	186.3	42.5	42.0	.5
222A		6692	Macon	GA	USED	350.6	142.7	89.0	
222A	WMKS	6693	Macon	GA	LIC	348.9	142.0	89.0	
221A	WUFFFFM	6707	Eastman	GA	LIC	8.5	79.4	42.0	
222A		7271	Pelham	GA	VACANT	238.9	89.1	89.0	.1
221A	WAZE	7297	Dawson	GA	LIC	284.2	97.5	42.0	
223A		7340	Zebulon	GA	USED	332.1	198.3	142.0	
223A	WEKS	7345	Zebulon	GA	CP	332.6	196.6	142.0	
223C1		7890	Panama City	FL	USED	234.7	218.9	211.0	7.9
223C1	WPAPFM	7920	Panama City	FL	LIC	241.8	233.2	211.0	22.2
224A		7934	Eufaula	AL	USED	283.6	176.4	89.0	
224A	WULAFM	7935	Eufaula	AL	LIC	283.6	176.4	89.0	
224A	WULAFM	7936	Eufaula	AL	CP	284.6	177.8	89.0	
224A	WULAFM	7971	Eufaula	AL	APP	284.6	177.8	89.0	

\*\*\*\*\* End of channel 223 study \*\*\*\*\*

\*\*\*\*\*

## FM CHANNEL SPACING STUDY

\*\*\*\*\*

Job title: Unionville, GA city center

Channel: 223C3

Database file name: g:\fccdata\fm931028.edx

Latitude: 31 26 12

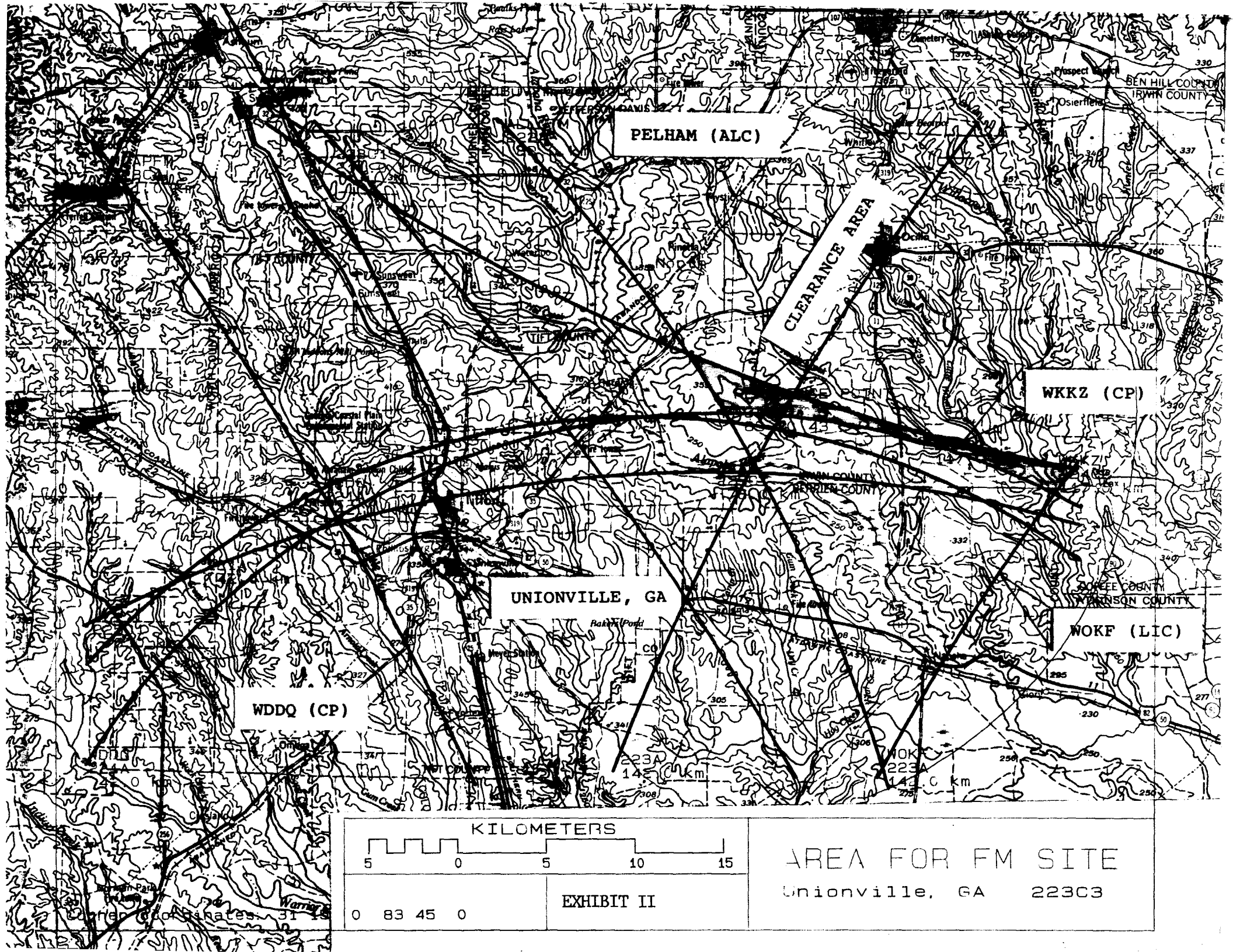
Longitude: 83 30 12

Pre-1989 Class A spacings?: N

CH	Call	Record	City	ST	Status	Bear.	Dist.	Reqd. Dist.	Result
223A	WOKF	5368	Folkston	GA	LIC	117.4	168.6	142.0	26.6
222C2	WSKX	5432	Hinesville	GA	LIC	81.3	202.6	117.0	
222C2		5437	Hinesville	GA	USED	74.7	190.6	117.0	
223A		6064	Alachua	FL	VACANT	151.9	206.6	142.0	
223A	NEW	6065	Alachua	FL	APPGID	152.4	210.6	142.0	
223A	NEW	6066	Alachua	FL	APPDID	151.4	207.9	142.0	
223A	NEW	6067	Alachua	FL	APPDID	150.7	215.5	142.0	
223A		6077	Folkston	GA	USED	113.5	154.6	142.0	12.6
223A	WKZZ	6101	Douglas	GA	CP	78.0	59.4	142.0	-82.6
223A		6110	Douglas	GA	USED	75.0	57.8	142.0	-84.2
224A	WKKZ	6130	Dublin	GA	LIC	25.1	133.2	89.0	
224C2	WKKZ	6133	Dublin	GA	CP	25.1	133.2	117.0	16.2
224C2		6156	Dublin	GA	USED	25.1	133.2	117.0	16.2
225C1	WAAC	6588	Valdosta	GA	LIC	168.7	71.6	76.0	-4.4
225C1		6591	Valdosta	GA	USED	168.7	71.6	76.0	-4.4
220A	NEW	6618	Monticello	FL	APP	206.2	94.7	42.0	
221A		6630	Adel	GA	USED	162.7	34.7	42.0	-7.3
221A	WDDQ	6647	Adel	GA	CP	156.1	36.1	42.0	-5.9
221A	WDDQ	6656	Adel	GA	LIC	162.7	34.7	42.0	-7.3
222A		6692	Macon	GA	USED	356.8	150.1	89.0	
222A	WMKS	6693	Macon	GA	LIC	355.2	148.8	89.0	
221A	WUFFFM	6707	Eastman	GA	LIC	16.9	91.6	42.0	
222A		7271	Pelham	GA	VACANT	238.8	71.5	89.0	-17.5
226A	WDKZ	7283	Blakely	GA	APP	265.2	127.6	42.0	
221A	WAZE	7297	Dawson	GA	LIC	292.4	86.0	42.0	
223A		7340	Zebulon	GA	USED	337.0	200.0	142.0	
223A	WEKS	7345	Zebulon	GA	CP	337.5	198.4	142.0	
223C1		7890	Panama City	FL	USED	234.3	201.4	211.0	-9.6
223C1	WPAPFM	7920	Panama City	FL	LIC	242.0	215.7	211.0	4.7
224A		7934	Eufaula	AL	USED	287.8	164.4	89.0	
224A	WULAFM	7935	Eufaula	AL	LIC	287.8	164.4	89.0	
224A	WULAFM	7936	Eufaula	AL	CP	288.9	166.0	89.0	
224A	WULAFM	7971	Eufaula	AL	APP	288.9	166.0	89.0	

\*\*\*\*\* End of channel 223 study \*\*\*\*\*





PELHAM (ALC)

CLEARANCE AREA

WKKZ (CP)

UNIONVILLE, GA

WOKF (LIC)

WDDQ (CP)

KILOMETERS

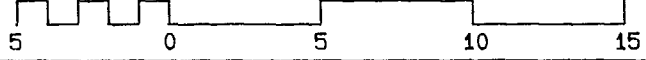


EXHIBIT II

AREA FOR FM SITE

Unionville, GA 22303